

**Chapter 8.0**

**Personnel Training**

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## 8.0 PERSONNEL TRAINING

This chapter discusses personnel training requirements based on WAC 173-303 and the Hanford Facility RCRA Permit, WA7890008967 (Permit). In accordance with WAC 173-303-806(4)(a)(xii), the *Hanford Facility Dangerous Waste Part B Permit Application* must contain two items: (1) "an outline of both the introductory and continuing training programs by owners or operators to prepare persons to operate or maintain the TSD facility in a safe manner as required to demonstrate compliance with WAC 173-303-330" and (2) "a brief description of how training will be designed to meet actual job tasks in accordance with the requirements in WAC 173-303-330(1)(d)." Permit Condition II.C (Personnel Training) contains training requirements applicable to Hanford Facility personnel and non-Facility personnel.

Compliance with these requirements at the 331-C Storage Unit is demonstrated by information contained in DOE/RL-91-28, Chapter 8.0 and this chapter.

### 8.1 OUTLINE OF INTRODUCTORY AND CONTINUING TRAINING PROGRAMS

The introductory and continuing training programs are designed to prepare personnel to manage and maintain the TSD unit in a safe, effective, and environmentally sound manner. In addition to preparing personnel to manage and maintain TSD units under normal conditions, the training programs verify that personnel are prepared to respond in a prompt and effective manner should abnormal or emergency conditions occur. Emergency response training is consistent with the description of actions contained in Chapter 7.0, Building Emergency Procedure. The introductory and continuing training programs contain the following objectives:

- Teach Hanford Facility personnel to perform their duties in a way that ensures the Hanford Facility's compliance with WAC 173-303
- Teach Hanford Facility personnel dangerous waste management procedures (including implementation of the contingency plan) relevant to the job titles/positions in which they are employed, and
- Verify that Hanford Facility personnel can respond effectively to emergencies.

#### 8.1.1 Introductory Training

Introductory training includes general Hanford Facility training and TSD unit-specific training. General Hanford Facility training is described in DOE/RL-91-28, Chapter 8.0, and is provided in accordance with the Permit Condition II.C.2. TSD unit-specific training is provided to Hanford Facility personnel allowing those personnel to work unescorted, and in some cases is required for escorted access. Hanford Facility personnel cannot perform a task for which they are not properly trained, except to gain required experience while under the direct supervision of a supervisor or coworker who is properly trained. Hanford Facility personnel must be trained within 6 months after their employment at or assignment to the Hanford Facility, or to a new job title/position at the Hanford Facility, whichever is later.

General Hanford Facility training: Refer to description in DOE/RL-91-28, Chapter 8.0.

Contingency Plan training: Hanford Facility personnel receive training on applicable portions of the *Hanford Emergency Management Plan* (DOE/RL-94-02) in general Hanford Facility training. In addition, Hanford Facility personnel receive training on the content of the description of actions contained in contingency plan documentation in Chapter 7.0 to be able to effectively respond to emergencies.

Emergency Coordinator training: Hanford Facility personnel who perform emergency coordinator duties in WAC 173-303-360 (e.g., Building Emergency Director) in the Hanford Incident Command System receive training on implementation of the contingency plan and fulfilling the position within the Hanford Incident Command System. These Hanford Facility personnel must also become thoroughly familiar with applicable contingency plan documentation, operations, activities, location, and properties of all waste handled, location of all records, and the unit/building layout.

Operations training: Dangerous waste management operations training (e.g., waste designation training, shippers training) will be determined on a unit-by-unit basis and shall consider the type of waste management unit (e.g., container management unit) and the type of activities performed at the waste management unit (e.g., sampling). For example, training provided for management of dangerous waste in containers will be different than the training provided for management of dangerous waste in a tank system. Common training required for compliance within similar waste management units can be provided in general training and supplemented at the TSD unit. Training provided for TSD unit-specific operations will be identified in the training plan documentation based on (1) whether a general training course exists, (2) the training needs to verify waste management unit compliance with WAC 173-303, and (3) training commitments agreed to with Ecology.

### **8.1.2 Continuing Training**

Continuing training meets the requirements for WAC 173-303-330(1)(b) and includes general Hanford Facility training and TSD unit-specific training.

General Hanford Facility training: Annual refresher training is provided for general Hanford Facility training. Refer to description in DOE/RL-91-28, Chapter 8.0.

Contingency plan training: Annual refresher training is provided for contingency plan training. Refer to description above in Section 8.1.1.

Emergency coordinator training: Annual refresher training is provided for emergency coordinator training. Refer to description above in Section 8.1.1.

Operations training: Refresher training occurs on many frequencies (i.e., annual, every other year, and every 3 years) for operations training. When justified, some training will not contain a refresher course and will be identified as a one-time only training course. The TSD unit-specific training plan documentation will specify the frequency for each training course. Refer to description above in Section 8.1.1.

## **8.2 DESCRIPTION OF TRAINING DESIGN**

Proper design of a training program verifies that personnel who perform duties on the Hanford Facility related to WAC 173-303-330(1)(d) are trained to perform their duties in compliance with WAC 173-303. Actual job tasks, referred to as duties, are used to determine training requirements. The first step taken to verify that Hanford Facility personnel have received the proper training is to determine and document the waste management duties by job title/position. The second step compares waste management duties to the general waste management unit training curriculum. If the general waste management unit training curriculum does not address the waste management duties, the training curriculum is supplemented and/or on-the-job training is provided. The third step summarizes the content of a training course necessary to verify that the training provided to each job title/position addresses associated waste management duties. The last step is to assign training curriculum to Hanford Facility personnel based on the previous evaluation. The training plan documentation contains this process.

Waste management duties include those specified in Section 8.1 as well as those contained in WAC 173-303-330(1)(d). Training elements of WAC 173-303-330(1)(d) applicable to the 331-C Storage Unit operations include the following:

- Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment
- Communications or alarm systems
- Response to fires or explosions
- Shutdown of operations.

Hanford Facility personnel who perform these duties receive training pertaining to their duties. The training plan documentation described in Section 8.3 contains specific information regarding the types of training Hanford Facility personnel receive based on the outline in Section 8.1.

### 8.3 DESCRIPTION OF TRAINING PLAN

In accordance with Permit Condition II.C.3, the unit-specific portion of the *Hanford Facility Dangerous Waste Permit Application* must contain a description of the training plan. Training plan documentation is maintained outside of the *Hanford Facility Dangerous Waste Part B Permit Application* and the Permit. Therefore, changes made to the training plan documentation are not subject to the Permit modification process. However, the training plan documentation is prepared to comply with WAC 173-303-330(2).

Documentation prepared to meet the training plan consists of hard copy and/or electronic media as provided by Permit Condition II.C.1. The training plan documentation consists of one or more documents and/or a training database with all the components identified in the core document.

A description of how training plan documentation meets the three items in WAC 173-303-330(2) is as follows:

1. -330(2)(a): "The job title, job description, and name of the employee filling each job. The job description must include requisite skills, education, other qualifications, and duties for each position."

Description: The specific Hanford Facility personnel job title/position is correlated to the waste management duties. Waste management duties relating to WAC 173-303 are correlated to training courses to verify that training is properly assigned.

Only names of Hanford Facility personnel who carry out job duties relating to TSD unit waste management operations at the 331-C Storage Unit are maintained. Names are maintained within the training plan documentation. A list of Hanford Facility personnel assigned to the 331-C Storage Unit is available upon request.

Information on requisite skills, education, and other qualifications for job title/positions are addressed by providing a reference where this information is maintained (e.g., human resources). Specific information concerning job title, requisite skills, education, and other qualifications for personnel can be provided upon request.

2. -330(2)(b): "A written description of the type and amount of both introductory and continuing training required for each position."

Description: In addition to the outline provided in Section 8.1, training courses developed to comply with the introductory and continuing training programs are identified and described in the training plan documentation. The type and amount of training is specified in the training plan documentation as shown in Table 8.1.

3. -330(2)(c): "Records documenting that personnel have received and completed the training required by this section. The Department may require, on a case-by-case basis, that training records include employee initials or signature to verify that training was received."

Description: Training records are maintained consistent with DOE/RL-91-28, Chapter 8.0.

**Table 8.1. 331-C Storage Unit Training Matrix**

	Training Category <sup>(a)</sup>				
Attachment 33, General Information Portion, Chapter 8.0 Training (DOE/RL-91-28) Category	General Hanford Facility Training	Contingency Plan Training	Emergency Coordinator Training	Operations Training	
331-C Storage Unit	Orientation Program	Building Emergency Plan	Building Emergency Director Training	Advanced Waste Management Training	Container Management
<b>Staff Position</b>					
Technical Group Lead	X	X	X <sup>1</sup>	X	X
Hazardous Waste Operations Staff	X	X	X <sup>(b)</sup>	X	X

<sup>1</sup> Required for any staff that has been assigned the duties of Building Emergency Director or alternate.

(a) Refer to the Environmental Management Services Department Training Plan for a complete description of coursework in each training category.

(b) Required for any staff that has been assigned the duties of Building Emergency Director or alternate.